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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AARON WARD

Plaintiff,

vs.

STATE OF NEVADA, DEPARTMENT OF
HEALTH AND HUMAN SERVICES,
DIVISION OF CHILD AND FAMILY
SERVICES, an agency of the State of Nevada;
DOES INDIVIDUALS 1-X; and ROES
STATE AGENCIES 1-X,

Defendants.

Case No. 2:20-cv-01336-JAD-BNW

**STIPULATION AND REQUEST FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

(First Request)

IT IS HEREBY STPULATED AND AGREED by the parties' undersigned counsel, subject to the Court's approval, that there will be a 14-day extension of time, up to and including **Monday, September 28, 2020**, for Defendant to file its response to Plaintiff's First Amended Complaint (ECF No. 18). This is the first request for an extension of time for Defendant to file a response to Plaintiff's First Amended Complaint. This request is based on good cause and is not sought for any improper purpose or delay.

After removing this action to federal court on July 20, 2020 (ECF No. 1), Defendant filed a Motion to Dismiss on August 11, 2020 (ECF No. 12). Plaintiff filed the First Amended Complaint on August 31, 2020, thereby mooting Defendant's Motion to Dismiss and obligating Defendant to file a new responsive pleading. The deadline for Defendant to respond to the First Amended Complaint is September 14, 2020.

Defendant is requesting additional time to file its response to Defendant's First Amended Complaint to accommodate defense counsel's pre-existing professional obligations in other legal matters, and because Defendant needs additional time to adequately and accurately answer the additional causes of action contained in Plaintiff's First Amended Complaint.

The parties, through their respective counsel, respectfully request that this Court extend Defendant's deadline to respond to Plaintiff's First Amended Complaint by 14 days, up to and including Monday, September 28, 2020.

DATED: September 10, 2020

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Attorneys for Plaintiff Aaron Ward

ORDER

IT IS SO ORDERED.


UNITED STATES JUDGE

DATED: September 14, 2020